Nevada Division of Environmental Protection
Chemical Accident Prevention Program
Element Audit Checklist

Facility:	Process(es) Covered:	Date:

VIII. PRE-STARTUP SAFETY REVIEW (PSSR) PROGRAM

A. PROCEDURE/POLICY REVIEW

1) EXISTENCE, STRUCTURE AND FORMAT OF PSSR PROGRAM	NAC Ref.	Resp. Code
Do PSSR records indicate that the reviews are being conducted, when review is required, pursuant to CAPP? (all requirements of section 2 must be met)	459.95425	

Notes/Comments Pertaining to Responses to Questions under Issue 1):

2) CONSTRUCTION VERIFICATION	NAC Ref.	Resp. Code
i. Does the PSSR procedure require verification that installed equipment and materials are confirmed to be in accordance with design specifications prior to introducing a substance into the process?	459.95425(2a)	
ii. Does the PSSR procedure require verification that installed instruments and controls are confirmed to be in accordance with design specifications prior to introducing substance into the process?	459.95425(2a)	
iii. Does the PSSR procedure require verification that construction work is confirmed to be in accordance with design specifications prior to introducing a substance into the process?	459.95425(2a)	

Notes/Comments Pertaining to Responses to Questions under Issue 2):

3) VERFICATION OF PROCEDURE DEVELOPMENT	NAC Ref.	Resp. Code
Does the PSSR procedure require that procedures are verified to be in place for the following:		
i. Standard Operating Procedures	459.95425(2b)	
ii. Safe Work Practices	459.95425(2b)	
iii. Maintenance Procedures	459.95425(2b)	
iv. Emergency Response	459.95425(2b)	

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Notes/Comments Pertaining to Responses to Questions under Issue 3):		

4) **PERFORMANCE OF A PROCESS HAZARD ANALYSIS AND MOC**	**NAC Ref.**	**Resp. Code**
i. Does the PSSR procedure require that a process hazard analysis be performed?	459.95425(2c)	
ii. Does the PSSR procedure require that all PHA recommendations be resolved prior to startup?	459.95425(2c)	
iii. Does the PSSR procedure require that an MOC be completed for all modifications of an existing process?	459.95425(2d)	

Notes/Comments Pertaining to Responses to Questions under Issue 4):		

5) **TRAINING**	**NAC Ref.**	**Resp. Code**
i. Does the PSSR procedure require that operating personnel are trained in the new process or change prior to their operating the process?	459.95425(2e)	
ii. Does the PSSR procedure require that maintenance personnel are trained in the new process or change prior to their performing maintenance on the process?	459.95425(2e)	

Notes/Comments Pertaining to Responses to Questions under Issue 5):		

6) **CONFIRMATION OF COMPLETION**	**NAC Ref.**	**Resp. Code**
i. Does the PSSR procedure require verification that all program requirements are satisfied prior to starting the new process or implementing the change?	459.95425(2)	

Notes/Comments Pertaining to Responses to Questions under Issue 6):		

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7) **VERIFICATION OF PSSR IMPLEMENTATION**	NAC Ref.	**Resp. Code**
i. Does the review of actual PSSRs indicate that they are being completed pursuant to CAPP requirements? *refer to Part B1*	459.95425(1)	
ii. Has the PSSR been applied when required? *refer to Part B2*	459.95425(1)	

Notes/Comments Pertaining to Responses to Questions under Issue 7):

General Procedure/Policy Review Notes/Comments:

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B. ON-SITE INSPECTION - RECORDS AUDIT					
1) REVIEW 1 TO 4 ISSUED PSSRs AGAINST THOSE LISTED ON THE DATA FORM.					
#	**PSSR ID #**	**Proposed Change**	**Issue Date**	**Approval Date**	**Startup Date**
i					
ii					
iii					
iv					

Inquiry/Observation	Resp. Code :			
	i	ii	iii	iv
a. Is there documented evidence that any installed equipment and materials were confirmed to be in accordance with design specifications prior to introducing a substance into the process?				
b. Is there documented evidence that any installed instruments and controls were confirmed to be in accordance with design specifications prior to introducing substance into the process?				
c. Is there documented evidence that any construction work was confirmed to be in accordance with design specifications prior to introducing a substance into the process?				
d. Is there documented evidence that the SOPs were confirmed to be in place and adequate prior to introducing a substance into the process?				
e. Is there documented evidence that the SWPs were confirmed to be in place and adequate prior to introducing a substance into the process?				
f. Is there documented evidence that the Maintenance Procedures were confirmed to be in place and adequate prior to introducing substance into the process?				
g. Is there documented evidence that the Emergency Response Procedure, was confirmed to be in place and adequate prior to introducing a substance into the process?				
h. Is there documented evidence that a Process Hazards Analysis (PHA) was performed prior to introducing a substance into the process?				
i. Is there documented evidence that all recommendations resulting from the PHA were resolved or implemented prior to startup of the process?				
j. Is there documented evidence that a Management of Change (MOC) review was performed for a modified process, and that all MOC requirements were met, prior to introducing a substance into the process?				
k. Is there documented evidence that training was completed for each employee involved in operating and maintaining the process prior to their working in the process?				
l. Based on the Response Codes used to complete items a - k above, is it possible to confirm that the PSSR was performed in accordance with program requirements?				

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Notes/Comments Pertaining to Responses to Questions under Issue 1):

2) PSSRs COMPLETED	NAC Ref.	Resp. Code
a. Have PSSRs been completed for circumstances requiring such? (Answer is limited to auditor's observations and inquiries. List any activities for which a PSSR was not conducted as required.)	459.95423(1)	

Notes/Comments Pertaining to Responses to Questions under Issue 2):

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General Records Review Notes or Comments:

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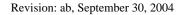
<table>
<tr><td colspan="2" align="center">C. INTERVIEWS</td></tr>
<tr><td colspan="2">1) SELECT TWO OR MORE OPERATING PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE PSSR PROCEDURE/POLICY USING THE FOLLOWING QUESTION SETS. (RESPONSES ARE TO BE LOGGED ON FOLLOWING PAGES.)</td></tr>
<tr><td>Question Set</td><td>Question Options/Phrasing</td></tr>
<tr><td align="center">a</td><td>What is your job description and associated tasks?</td></tr>
<tr><td align="center">b</td><td>Do you know what the PSSR program is, and why it exists?
How does the PSSR process work?</td></tr>
<tr><td align="center">c</td><td>When is a PSSR required?
What is the connection between the MOC and PSSR programs?</td></tr>
<tr><td align="center">d</td><td>How are you involved in the PSSR process?</td></tr>
<tr><td align="center">e</td><td>How do you know when a PSSR is being performed on a process?
How are you informed when it is OK to re-start a modified process?
Are you trained in revised procedures, policies, practices, programs and process steps prior to process start-up?</td></tr>
<tr><td align="center">f</td><td>Do you feel that the PSSR program could be improved?</td></tr>
</table>

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C. INTERVIEWS			
2) RECORD RESPONSES OF SELECTED OPERATING OR MAINTENANCE PERSONNEL TO QUESTIONS FROM THE QUESTION SETS (LISTED ON THE FIRST PAGE OF SECTION C)			
Employee Profile			
Job Title/Position	**Department/Unit/Group**	**Time in Job**	**Time w/Co.**

Response to Question Set _:

Response to Question Set _:

Response to Question Set _:

Response to Question Set _: